

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

<b>Illinois Power Agency</b>	:	
	:	
<b>Petition for Approval of its 2017</b>	:	<b>16-0453</b>
<b>Procurement Plan pursuant to Section</b>	:	
<b>16-111.5(d)(4) of the Public Utilities Act.</b>	:	

**VERIFIED PETITION TO INTERVENE  
OF THE  
BOARD OF TRUSTEES OF THE UNIVERSITY OF ILLINOIS  
ON BEHALF OF THE  
ENERGY RESOURCES CENTER  
AT THE  
UNIVERSITY OF ILLINOIS AT CHICAGO**

The Board of Trustees of the University of Illinois on behalf of the Energy Resources Center at the University of Illinois at Chicago ("ERC"), by its undersigned attorney, pursuant to 83 Ill. Admin. Code § 200.200, hereby respectfully petitions the Illinois Commerce Commission ("Commission") for leave to intervene and participate in this docket. In support of this petition, the ERC states as follows:

1. On September 27, 2016, the Illinois Power Agency ("IPA") filed with the Commission a petition seeking approval of the IPA's 2017 Electricity Procurement Plan ("2017 Plan") pursuant to Section 16-111.5(d)(4) of the Public Utilities Act, 220 ILCS 5/1-101 et seq. Accompanying the petition is a copy of the IPA's proposed 2017 Plan covering the procurement of electricity and renewable energy credits for customers of certain Illinois electric distribution utilities for the period June 2017 through May 2022.

2. The ERC, located within the College of Engineering at the University of Illinois at Chicago, was founded in 1973 as an organization dedicated to energy efficiency and the environment. Today, the ERC is an interdisciplinary public service, research, and special projects organization that provides expertise in the areas of energy efficiency, distributed generation, utilities billing management, and biofuels and bioenergy.

3. The ERC is interested in this proceeding because it has submitted proposals for inclusion in the 2017 Plan that promote and encourage energy efficiency in the service territories of Ameren Illinois Company and Commonwealth Edison Company.

4. To the extent that there are any objections or concerns with its proposals, no other party can adequately respond to such objections or concerns and no other party can represent the ERC's interests in this matter.

5. All correspondence to the ERC should be addressed to:

John D. Albers  
Shay Phillips, Ltd.  
Twin Towers Plaza  
456 Fulton Street, Suite 255  
Peoria, Illinois 61602  
(309) 494-6155 telephone  
[jalbers@shay-law.com](mailto:jalbers@shay-law.com)

David Baker  
Stefano Galiasso  
Energy Resources Center (MC 156)  
University of Illinois at Chicago  
1309 South Halsted St, suite 205  
Chicago, IL 60607

(312) 996-2615 (Baker telephone)  
dsbaker@uic.edu  
(312) 996-8646 (Galiasso telephone)  
sgalia2@uic.edu

6. The ERC agrees to accept service by electronic means as provided for in  
83 Ill. Admin. Code §200.1050.

WHEREFORE, the Board of Trustees of the University of Illinois on behalf of the  
Energy Resources Center at the University of Illinois at Chicago respectfully requests  
leave to intervene and to participate as a party in this proceeding.

Dated: October 19, 2016

Respectfully submitted,

The Board of Trustees of the University of Illinois  
on behalf of the Energy Resources Center at the  
University of Illinois at Chicago




John D. Albers  
Shay Phillips, Ltd.  
Twin Towers Plaza  
456 Fulton Street, Suite 255  
Peoria, Illinois 61602  
(309) 494-6155 telephone  
(309) 494-6156 facsimile  
[jalbers@shay-law.com](mailto:jalbers@shay-law.com)

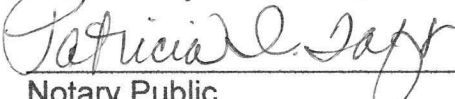
STATE OF ILLINOIS :  
: SS.  
COUNTY OF SANGAMON :

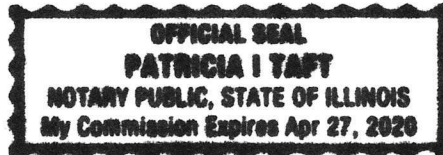
### VERIFICATION

John D. Albers, on oath, states that he is an attorney for the Board of Trustees of the University of Illinois on behalf of the Energy Resources Center at the University of Illinois at Chicago, that he is authorized to make this verification on behalf of the Board of Trustees, that he has read the foregoing Petition to Intervene and is familiar with the matters set forth therein, and that the matters set forth in the Petition to Intervene are true and correct to the best of his knowledge, information, and belief.

  
John D. Albers

Subscribed and sworn to before me  
this 19<sup>th</sup> day of October, 2016.

  
Notary Public



### CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that he has caused the Petition to Intervene of the Board of Trustees of the University of Illinois on behalf of the Energy Resources Center at the University of Illinois at Chicago in Docket No. 16-0453 to be served on each of the following persons on the Service List by e-mail on October 19, 2016.



John D. Albers  
Attorney for the Board of Trustees of the  
University of Illinois on behalf of the  
Energy Resources Center at the  
University of Illinois at Chicago